REMARKS

Applicant respectfully requests reconsideration and allowance of the subject Application. Claims 1-39 are pending in the instant Application. Claims 1, 15, 21 and 26 are independent claims. The remaining claims are dependent on one of the indicated independent claims.

Claim Rejections Under 35 U.S.C. § 102

Claims 1-39 stand rejected under 35 U.S.C. § 102(b) as being anticipated by a reference document to Altova Inc. & Altova GmbH, "XML Spy Suite 4.4, User and Reference Manual Version 4.1" (hereinafter "XML document"). This rejection is respectfully traversed.

At least one independent claim of the instant Application recites "combining data having at least two different encodings; and presenting the combining data as homogenized data according to a reference encoding." (See claim 1.) The other independent claims of the instant Application recite similar subject matter. In the following, the Applicant explains why the XML document fails to teach or suggest at least the subject matter of the rejected independent claims.

The Office asserts pages 117-131, 208-209, 202-304, and 551-553 disclose the subject matter of the rejected independent claims. The Office does not point to a specific portion of the identified pages that supposedly anticipates the language of the rejected claims. Accordingly, Applicant has carefully reviewed the XML document, with added analysis given to the pages specified by the Office, but was unable to find disclosure that could reasonably be found to anticipate or suggest the recitation of the rejected claims.

Page 123 of the XML document describes an encoding technique that allows a user to "select a different encoding when saving the current document the nest time." However, there is no mention of combining data having at least two different encodings, and presenting the combining data as homogenized data according to a reference encoding. The encoding technology described by the XML document is only capable of encoding a file in a different encoding than the encoding it is currently encoded with. (See text under the header "Encoding...".)

Page 208 of the XML document describes how to import a text file into XML. The description is found under the header "Import Text file..." According to the XML document, the Spy technology imports any "structured text" into XML, but the file encoding must be specified. Specifying the encoding type is made possible using the "File encoding" dropdown menu shown in the user interface window on page 208. There is no mention that combining data having at least two different encodings, and presenting the combining data as homogenized data according to a reference encoding is possible using the user interface illustrated on page 208 of the XML document.

Page 303 of the XML document describes that a user of the Spy technology may specify "the kind of character-set encoding to be used when crating new files, as well as the encoding assumed, when opening files that lack an encoding declaration." (See text under the header "Encoding".) Again, there is no mention of combining data having at least two different encodings, and presenting the combining data as homogenized data according to a reference encoding.

Pages 551-553 describe that the Spy technology supports Unicode and Unicode for various Windows platforms. However, this portion of the XML document does not disclose or suggest combining data having at least two

different encodings, and presenting the combining data as homogenized data according to a reference encoding.

In accordance with the above, Applicant respectfully submits that the XML document fails to teach or suggest the subject matter of the independent claims. Thus, those claims are allowable. The claims dependent on the indicated independent claims are at least allowable due to their dependence upon an allowable independent claim.

In view of the comments provided in this Response, Applicant respectfully submits that the claims of the subject Application are in condition for Allowance. Therefore, reconsideration and withdrawal of the claim rejections are respectfully requested.

Conclusion

All claims are in condition for allowance. Applicant respectfully requests prompt allowance of the subject Application. If any issue remains unresolved that would prevent allowance of this case, **the Examiner is requested to contact the undersigned attorney to resolve the issue**.

Respectfully Submitted,

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